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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PEPPER & CORAZZINI, LLP
ATTORNEYS AT LAW

1776 K STREET, N.W., SUITE 200
WASHINGTON, D.C. 20006-2334

PATRICIA M. CHUH
EXT. 280
PMC@COMMLAW.COM

DOCKET FILE COPY ORIGINAL

(202) 296-0600
FAX (202) 296-5572
WWW.COMMLAW.COM

March 28, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Amendment of Section 73.202(b)
FM Table of Allotments
(Dillsboro, North Carolina)

Dear Ms. Salas:

Transmitted herewith on behalf of Sutton Radiocasting Corporation, is an original and four copies of its Petition for Rule Making seeking the commencement of a proceeding to amend the FM Table of Allotments to allot Channel 237A to Dillsboro, North Carolina, as its first local transmission service.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,



John F. Garziglia
Patricia M. Chuh

Enclosures

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List ABCDE

MMB

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of)	
)	
Amendment of Section 73.202(b))	
Table of Allotments,)	MM Docket_____
FM Broadcast Stations)	
(Dillsboro, North Carolina))	RM_____

To: Chief, Allocation Branch
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULE MAKING

SUTTON RADIOCASTING CORPORATION ("SRC"), a South Carolina corporation, hereby petitions the Commission to institute a Notice of Proposed Rule Making (NPRM) for the allocation of Channel 237A to Dillsboro, North Carolina, as that community's first broadcast service. SRC gives the required verifications and also certifies that if the Commission allocates the channel, it, or an entity in which it participates, will file an application for a construction permit.

CHANNEL 237A AT DILLSBORO QUALIFICATIONS

The Commission recently granted a license to WBTS, Athens, Georgia to operate from its C1 site and canceled its full C status. With the licensing of the WBTS C1 site, the clear area to allocate an FM at Dillsboro, on first adjacent channel 237, was created.

Attached, as Exhibit-1, is an FM spacing study showing the clear area for channel 237A near Dillsboro. This study does not recognize Channel 238C at Athens, Georgia since it is now abandoned. Attached, as Exhibit-2, is a plot demonstrating compliance with CFR 73.315(a) and (b) relating to city grade, 70 dBu (3.16 mvm) contour coverage. Exhibit-2 clearly shows that this contour will fully encompass the entire area of Dillsboro, North Carolina.

DILLSBORO, NORTH CAROLINA

Dillsboro is located in Jackson County, North Carolina. It is a functioning community with its own elected city government, a post office, fire and law enforcement protection and corporate city limits which give it necessary indicia required by the Commission to be a community of license. According to the North Carolina Office of State Planning, Dillsboro had a population of 121 persons in April 1990. By July 1998, this state office reported the Dillsboro population at 170 persons, an increase of forty (40) percent.

PETITION SUMMARIZED

The petition for the allocation of Channel 237A at Dillsboro could be summarized as follows:

COMMUNITY	PRESENT	PROPOSED
Dillsboro	None	237A

No substitutions of channels in other markets or interruption of service are necessary for this allocation.

EXPRESSION OF INTEREST

SRC hereby certifies that it is interested in the allocation of channel 237A at Dillsboro and if the channel is allocated, it, or an organization in which it participates, will timely file an application for a construction permit. It further states that it, or an entity in which it is a participant, will construct and daily operate this station, if it is the successful applicant.

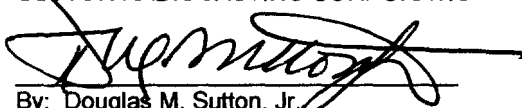
CONCLUSION

SRC is petitioning the Commission to institute a Notice of Proposed Rule Making leading to the allocation of Channel 237A to Dillsboro, North Carolina as that community's first broadcast service. SRC certifies that it, or an entity in which it participates, will apply for the license at Dillsboro if the channel is allocated.

CERTIFICATION

SUTTON RADIOCASTING CORPORATION, Petitioner for the allocation of a new FM broadcast channel at Dillsboro, North Carolina, does hereby verify that the statements contained in this Petition for Rule Making are true and correct to the best of its knowledge and belief. It represents that this Petition is not filed for the purpose of impeding, obstructing or delaying determination on any other application or petition with which it may be in conflict.

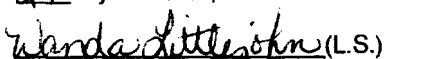
Respectfully submitted,
SUTTON RADIOCASTING CORPORATION


By: Douglas M. Sutton, Jr.
Its President

This 24 day of March, 2000

SUTTON RADIOCASTING CORPORATION
Post Office Box 5
Union, South Carolina 29379
Phone (864) 427-2242
Fax (864) 427-3394
e-mail: sutton@suttonradiocasting.com

SWORN to and Subscribed before me on this
24 day of March, 2000.


Wanda Littlejohn (L.S.)
Notary Public for South Carolina
My Commission Expires: 7-1-2003

**Sutton Radiocasting Companies
Petition To Add
Channel 237A
DILLSBORO, NC.**

March 2000

TECHNICAL EXHIBIT

The following technical exhibit has been prepared on behalf of Sutton Radiocasting Companies. The purpose is to request the addition of channel 237A to Dillsboro, NC as that communities first local FM service.

Attached as Exhibit-1 is a spacing study showing the clear-area-to-locate channel 237A, site restricted to the Southeast of the city of Dillsboro. WBTS, Athens Georgia was recently granted a license to operate from it's C1 site and has canceled it's full C status. Exhibit-1 does not recognize Channel 238C at Athens, Ga. since it is now abandoned.

Exhibit-2 is a proposed coverage map showing that the 70 dBu (3.16 mV/m) signal contour will fully encompass the city of Dillsboro without terrain restriction. This plot assumes full power of 6.0kw ERP and 100m HAAT as allowed for an A class facility.

Sutton Radiocasting Companies proposes the following:

DILLSBORO, NC.

Before

After

-0-

237A

Conclusion:

Sutton Radiocasting Companies proposes to add Channel 237A to Dillsboro, North Carolina as that communities first local FM service. The attached technical exhibits clearly show that Channel 237A can be allotted without interference to any existing or proposed facility and therefore should be granted.

March, 09, 2000

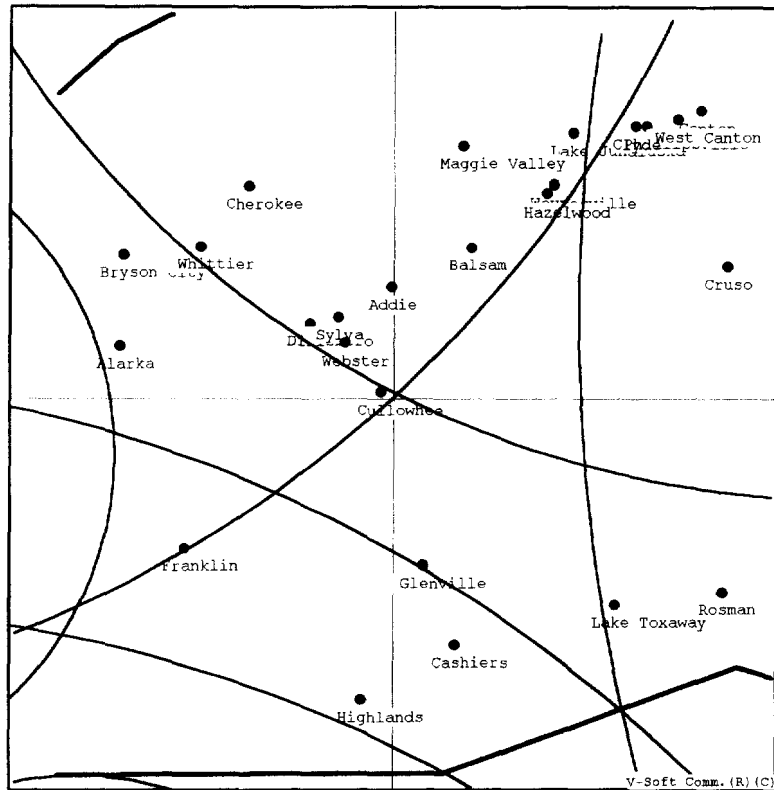

Clyde Scott, Jr.

EXHIBIT - 1
DILLSBORO, NC.

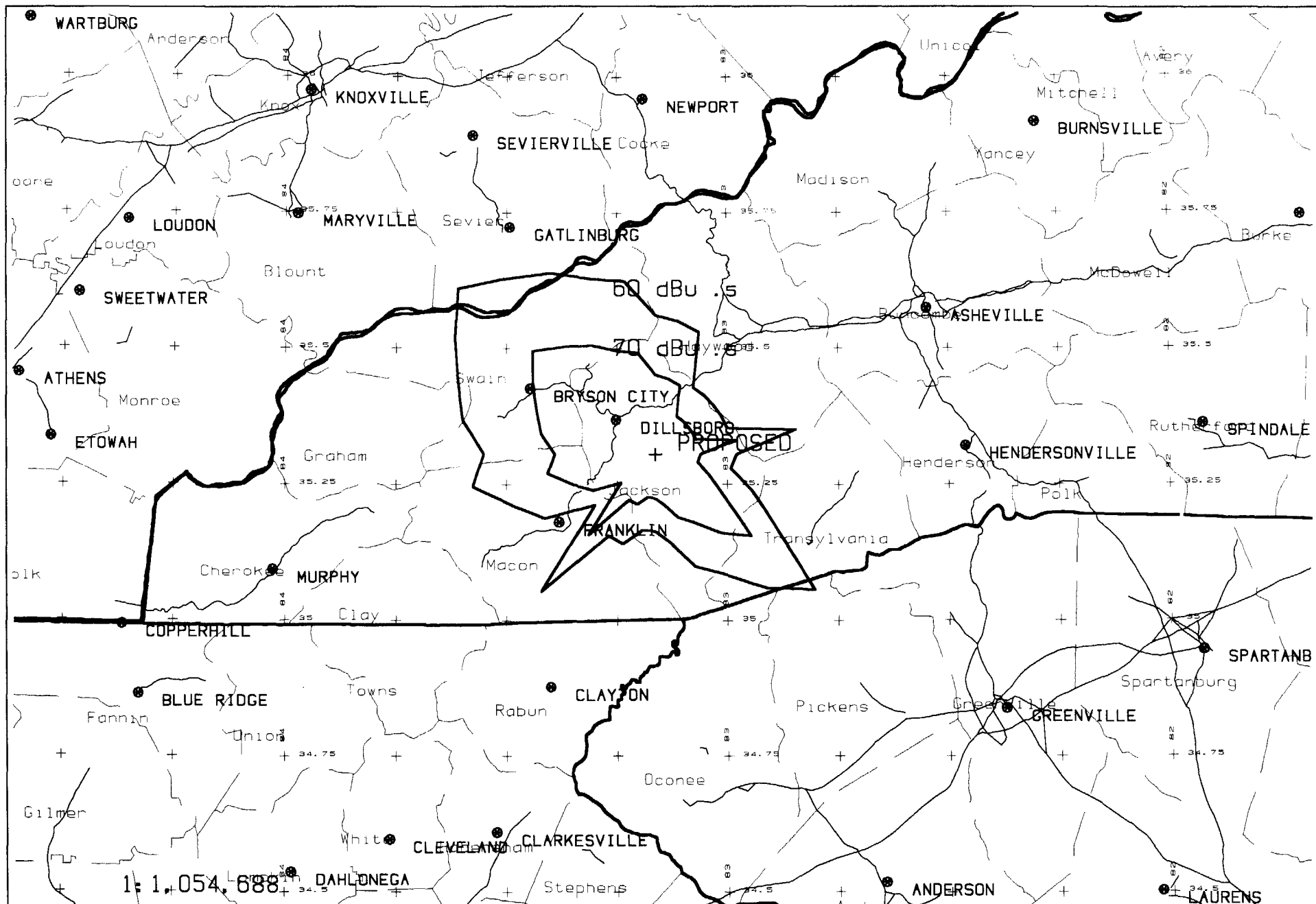
SEARCHFM^(TM) LOCATE STUDY

Ch 237 A
95.3 MHz

N. Lat. 35 18 21
W. Lng. 83 09 50

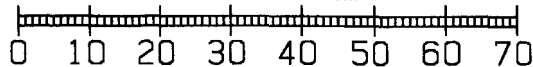


Call	CH#	Location		D-KM	Azi	FCC	Margin
WYFC	237A	Clinton	TN	115.16	318.0	115.0	0.16
WIKQ	235C	Greeneville	TN	95.58	26.4	95.0	0.58
WBTS.A	238C1	Athens	GA	145.59	206.0	133.0	12.59
WNKS	236C	Charlotte	NC	182.71	87.5	165.0	17.71
WCVF-F	240A	Robbinsville	NC	57.70	264.9	31.0	26.70
WBTS.C	238C1	Athens	GA	162.77	200.5	133.0	29.77
WALV	237A	Cleveland	TN	154.59	264.7	115.0	39.59
WNGC	291C	Toccoa	GA	70.59	205.0	29.0	41.59
WNKS	236C	Charlotte	NC	206.88	90.5	165.0	41.88
WALV.A	237A	Cleveland	TN	168.89	263.7	115.0	53.89
WTXM.C	239A	Maryville	TN	97.32	307.2	31.0	66.32
WTXM	239A	Maryville	TN	97.32	307.2	31.0	66.32
WMXK	240A	Morristown	TN	103.42	351.6	31.0	72.42
WMXK.C	240A	Morristown	TN	103.47	351.6	31.0	72.47



1:1,054,688

Scale in km



PROPOSED 237A

N. Lat. 35 18 21

6kW

W. Lng. 83 09 50

1055.35M AMSL

PROPOSED DILLSBORO, NC.

EXHIBIT - 2

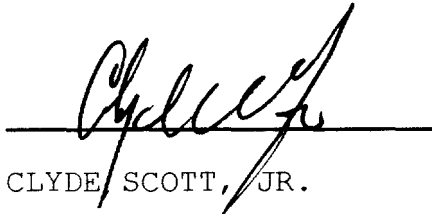
DECLARATION AND QUALIFICATIONS OF PREPARER

STATE OF GEORGIA)
CITY OF MOULTRIE) §
COLQUITT COUNTY)

CLYDE SCOTT, JR. , UNDER PENALTY OF PERJURY, DECLARES AND SAYS
HE IS A BROADCAST ENGINEER AND PRESIDENT OF EME COMMUNICATIONS.
HE HAS BEEN ENGAGED TO PREPARE THE ATTACHED TECHNICAL EXHIBIT.

THAT HIS QUALIFICATIONS ARE A MATTER OF RECORD BEFORE THE FEDERAL
COMMUNICATIONS COMMISSION AND HAS BEEN ACTIVE IN THE BROADCAST
INDUSTRY SINCE 1965 AND IN BROADCAST ENGINEERING SINCE 1972. THAT
HE IS THE HOLDER OF GENERAL RADIOTELEPHONE LICNESE NO. PG-6-30133.

THAT THE ATTACHED TECHNICAL EXHIBIT WAS EITHER PREPARED BY HIM
OR UNDER HIS DIRECT SUPERVISION. ALL MATERIAL AND EXHIBITS HERETO
ARE BELIEVED TO BE TRUE AND CORRECT.


CLYDE SCOTT, JR.